

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ANNAPURNA, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	
AMGUARD INSURANCE COMPANY,)	
)	
Defendant.)	

**DEFENDANT AMGUARD INSURANCE COMPANY’S NOTICE OF REMOVAL
OF ACTION TO THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

COMES NOW, AmGuard Insurance Company, by and through its counsel, RUSIN & MACIOROWSKI, LTD., and for its Petition for Removal pursuant to 28 U.S.C. §§ 1332(a)(1), 1441(a) and 1446(a), states as follows:

1. Defendant AmGuard Insurance Company seeks to remove the state action Cause No. 2021 CH 03129 filed in the Circuit Court of Cook County, Illinois.
2. Removal is appropriate pursuant to 28 U.S.C. 1441(a) as this Court has original jurisdiction over the case based upon diversity of citizenship pursuant to 28 U.S.C. 1332(a)(1). Pursuant to the claims set forth in Plaintiff’s First Amended Complaint, the matters in controversy exceed \$75,000.00 based on Plaintiff’s alleged damages, exclusive of interest and costs, and complete diversity exists between Plaintiff Annapurna, Inc. and Defendant AmGuard Insurance Company. (See Exhibit A - Plaintiff’s First Amended Complaint).
3. That upon information and belief, Plaintiff Annapurna, Inc. is a citizen of the State of Illinois with its principal place of business located in Illinois. (See Exhibit A – Plaintiff’s First Amended Complaint, ¶ 1).

4. That Defendant AmGuard Insurance Company is not a citizen of Illinois as it maintains its principal place of business at 39 Public Square, Wilkes-Barre, Pennsylvania 18703, and is not incorporated in Illinois. (See Exhibit A – Plaintiff’s First Amended Complaint, ¶ 2).

5. Pursuant to 28 U.S.C. 1446(a), AmGuard Insurance Company provides this Court with a copy of Plaintiff’s First Amended Complaint, and the Exhibits thereto.

6. That the First Amended Complaint was filed against AmGuard Insurance Company with the state court on September 10, 2021, making removal timely.

7. As required by 28 U.S.C. §1446(b), counsel for AmGuard Insurance Company is providing written notice of the filing of this Notice of Removal to counsel for the Plaintiff and is filing a copy of this Notice of Removal with the Clerk of the Circuit Court of Cook County, Illinois.

WHEREFORE, AMGUARD INSURANCE COMPANY respectfully requests that the state case titled Annapurna, Inc. v. AmGuard Insurance Company, Cause No. 2021 CH 03129 pending in the Circuit Court of Cook County, Illinois, be removed to the United States District Court for the Northern District of Illinois, Eastern Division, and for such other and further relief as this court deems is just and proper.

Respectfully submitted,

RUSIN & MACIOROWSKI, LTD.

By: /s/Douglas B. Keane
Douglas B. Keane, one of the attorneys for
Defendant AmGuard Insurance Company

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